



BellSouth Telecommunications, Inc. Legal Department 1600 Williams Street Suite 5200 Columbia, SC 29201

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August 17, 2005

Mr. Charles Terreni Chief Clerk of the Commission Public Service Commission of South Carolina Post Office Drawer 11649 Columbia, South Carolina 29211

Re: Petition to Establish Generic Docket to Consider Amendments to Interconnection Agreements Resulting From Changes of Law Docket No. 2004-316-C

Dear Mr. Terreni:

Enclosed for filing are the original and ten copies of a Joint Notice of Depositions Taken by Agreement of the Parties in the above-referenced matter. By copy of this letter, BellSouth is serving this pleading on all parties of record to this docket.

Sincerely,

Patrick W. Turner

PWT/nml Enclosure

cc: All Parties of Record

DM5 #575994

# BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

In Re:	)		يار سو
	)	Docket No. 2004-316-C	Ţ~
Petition to Establish Generic Docket to	)		
Consider Amendments to Interconnection	)		
Agreements Resulting From Changes of Law	)		
	)		

# JOINT NOTICE OF DEPOSITIONS TAKEN BY AGREEMENT OF THE PARTIES

BellSouth Telecommunications, Inc. ("BellSouth"), Competitive Carriers of the South, Inc. ("CompSouth"), XO Communications, Inc. ("XO"), Sprint Communications Company L.P. ("Sprint"), ITC^DeltaCom Communications, Inc. ("DeltaCom"), CBeyond Communications, Inc. ("CBeyond") (collectively "Parties") jointly file the following notice of depositions to be taken in the above-referenced docket. The Parties state as follows:

1. The above-referenced generic change of law docket is similar to change of law proceedings pending at state regulatory commissions in all nine states in the BellSouth region. The Parties expect the issues addressed in each of the nine states will be similar in most respects. In recognition of the common issues being addressed in the generic change of law dockets, the Parties have agreed that discovery will, to the extent feasible, take place on a region-wide basis.

- 2. In particular, the Parties have agreed that depositions taken by agreement regarding testimony in the above-referenced docket may be used by either party, subject to applicable evidentiary objections, in the generic change of law proceedings now pending in all nine states in the BellSouth region. The depositions included in this Notice are being taken by agreement, and the parties anticipate using the depositions in this docket as well as the other pending generic change of law proceedings.
- 3. The depositions subject to this Notice are the following (all times are Eastern):

### Thursday, August 18, 2005

10 A.M.: BellSouth will depose CompSouth witness Edward J. Cadieux telephonically. The following telephone conference bridge will be used: 1-800-851-3876, access code 335-0750. BellSouth requests that Mr. Cadieux have a notary present to take his oath.

#### Friday, August 19, 2005

9 a.m.: BellSouth will depose DeltaCom witness Jerry Watts.

11 a.m.: BellSouth will depose DeltaCom witness Mary Conquest

\*1:00 p.m.: BellSouth will depose DeltaCom witness Steve Brownworth

The DeltaCom witnesses will be deposed at the law offices of Sutherland, Asbill, & Brennan, 999 Peachtree Street, N.E., Atlanta, Georgia. \* Mr. Brownworth's proposed date is dependent on his release from jury duty. In the event that Mr. Brownworth is not released, his deposition will take place on Monday, August 22, 2005 at 9:00 a.m., and will be conducted telephonically at the following telephone conference bridge: 1-800-851-3876, access code 335-0750.

## Tuesday, August 23, 2005

10 A.M.: BellSouth will depose Sprint witness James M. Maples telephonically. The following telephone conference bridge will be used: 1-800-851-3876, access code 335-0750. BellSouth requests that Mr. Maples have a notary present to take his oath.

1:30 P.M.: BellSouth will depose CBeyond witness Thomas A. Hyde at the law offices of Sutherland, Asbill, & Brennan, 999 Peachtree Street, N.E., Atlanta, Georgia.

# Thursday, August 25, 2005

10 A.M.: BellSouth will depose XO witness Kristin Shulman telephonically. The following telephone conference bridge will be used: 1-800-851-3876, access code 335-0750. BellSouth requests that Ms. Shulman have a notary present to take his oath.

4. The parties reserve the right to schedule additional depositions in this proceeding prior to the scheduled hearing dates.

This 17<sup>th</sup> day of August, 2005.

Respectfully submitted,

Patrick W. Turner

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BELLSOUTH TELECOMMUNICATIONS, INC.

STATE OF SOUTH CAROLINA	)	
	)	CERTIFICATE OF SERVICE
COUNTY OF RICHLAND	)	

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused the Joint Notice of Depositions Taken by Agreement of the Parties in Docket No. 2004-316-C to be served upon the following this August 17, 2005.

Florence P. Belser, Esquire General Counsel Post Office Box 11263 Columbia, South Carolina 29211 (Office of Regulatory Staff) (U. S. Mail and Electronic Mail)

Jocelyn G. Boyd, Esquire Staff Attorney S. C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) (U. S. Mail and Electronic Mail)

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Robert E. Tyson, Jr., Esquire Sowell Gray Stepp & Laffitte 1310 Gadsden Street Columbia, South Carolina 29211 (ITC^Delta Com Communications, Inc.) (U. S. Mail and Electronic Mail)

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Darra W. Cothran, Esquire Woodward, Cothran & Herndon 1200 Main Street, 6th Floor Post Office Box 12399 Columbia, South Carolina 29211 (MCI WorldCom Network Service, Inc. MCI WorldCom Communications and MCImetro Access Transmission Services, Inc.) (U. S. Mail and Electronic Mail)

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Marsha A. Ward, Esquire Kennard B. Woods, Esquire MCI WorldCom, Inc. Law and Public Policy 6 Concourse Parkway, Suite 3200 Atlanta, Georgia 30328 (MCI)

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